

Comments on WT Docket No. 03-187; FCC 06-164  
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1: The primary purpose for night time communications tower lighting is to further aircraft navigational safety by marking obstacles to air navigation.

2: It has been well documented at least for the last 40 years in both the military and civil aviation communities in the US and the international community that exposure to strobe lighting can cause flicker vertigo resulting in pilot disorientation, aircraft mishaps and loss of human life. Standard operating procedure during IFR flying conditions requires pilots to turn off aircraft strobe lights. Any ground lighting which can distract from airport navigational lighting is a known hazard to aviation.

3: There is an assertion that communications tower bird strikes occur primarily at night, however this is unproven.

4: There is an assertion that night time communication tower white strobe lighting reduces migratory bird kill rates over those of all forms of red lighting, however this is unproven.

5: Studies on communications tower bird strikes have largely been funded and staffed by organizations which are biased in favor of the assertions listed above as comments number 3 and 4. Lobbying effort in favor of an amendment to the present rules has been carried on by these same organizations, in the absence of any compelling public interest. The organizations involved admit that they have not studied all the alternatives to the white strobe lighting they recommend. Nor have they studied human risks of their proposed changes.

6: The replacement of steady or blinking red communication tower lighting by any form of strobe lighting, especially white strobe lighting increases the hazard to aviation. Bird strikes are insufficient rationalization to risk the health and safety of the aviation community.

7: Communications tower white strobe lighting produces a human hazard in non-aviation situation, primarily automobile driving and any outdoor activity where flicker vertigo can be produced.

References of interest:

<http://stinet.dtic.mil/oai/oai?&verb=getRecord&metadataPrefix=html&identifier=AD0646872>

[http://www.faa.gov/library/manuals/aircraft/airplane\\_handbook/media/faq-h-8083-3a-5of7.pdf](http://www.faa.gov/library/manuals/aircraft/airplane_handbook/media/faq-h-8083-3a-5of7.pdf)